FEDERAL COMMUNICATIONS COMMISSION Washington, D. C. 20554 JUL 0 9 2001

OFFICE OF MANAGING DIRECTOR

Richard Estevez, Esq.
Fletcher, Heald & Hildreth, P.L.C.
11th Floor
1300 North 17th Street

86-285

Re: Petition for Reduction of Regulatory Fees for FY 1998 Fee Control No. 9809158835519002

Dear Mr. Estevez:

Arlington, VA 22209-3801

This letter is in response to your request for reduction of the regulatory fees for Fiscal Year 1998 and waiver of the associated penalty of \$3,250.00 for insufficient payment, submitted on behalf Pappas Concord Partners, licensee of stations KTNC(TV), Concord, California and KFWU(TV), Fort Bragg, California.

It appears that \$1,175.00 was submitted as the regulatory fee for KTNC(TV) for FY 1998, but that on March 3, 1999 Pappas was informed that the correct fee for KTNC(TV) should be \$14,175.00, leaving a balance due of \$13,000.00, that a penalty of \$3,250.00 was warranted and that Pappas owes the Commission a total of \$16,250.00. You state, inter alia, that KTNC(TV) rebroadcasts, as a satellite, the programming broadcast by KFWU(TV), and that \$1,175.00, the amount paid, is the correct regulatory fee for a TV station operating as a satellite. Although you also argue, alternatively, that the FY 1998 regulatory fee for KFWU(TV) should be reduced, that is a question that is unrelated to the fees due for KTNC(TV) and that, if warranted, should be raised in an independent waiver request.

In connection with your claim that KTNC(TV) operates as a satellite, you note that the 1998 Edition of Television & Cable Factbook does not recognize KTNC(TV)'s operation as a satellite and you acknowledge that the 1999 Edition of Television & Cable Factbook lists KTNC(TV) as the parent in a satellite relationship. Indeed the 2000 Edition of Television & Cable Factbook reflects the same information. Under these circumstances, and in the absence of any other documentation establishing that KTNC(TV) is in fact operating solely as a satellite of another station, you have failed to demonstrate that your request for reduction of the FY 1998 regulatory fees by an amount of \$13,000.00, or for waiver of the associated penalty in the amount of \$3,250.00, is warranted. Therefore, your request is dismissed. Payment of the 1998 regulatory fee and penalty in the total amount of \$16,250.00 is now due. This payment should be submitted together with a Form 159 (copy enclosed) within 30 days from the date of this letter. In view of your

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allegations, however, your request may be refiled together with appropriate supporting documentation within 30 days from the date of this letter.

If you have any questions concerning this letter, please contact the Revenue and Receivable Operation Group at (202) 418-1995.

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Mark Reger

Chief Financial Officer

SAM RAVENDER ANNE GODDWIN CRUMP VINCENT & CURTIS, JR. RICHARD J ESTEVEZ PAUL J FELDMAN RICHARD HILDRETH FRANK R JAZZO ANDREW S. KERSTING EUGENE M. LAWSON, JR. SUSAN A. MARSHALL HARRY C. MARTIN GEORGE PETRUTSAS RAYMOND & QUIANZON LEONARD R. RAISH JAMES P. RILEY KATHLEEN VICTORY HOWARD M. WEISS . NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

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FRANK U. FLETCHER (1939-1985) ROBERT L. HEALD PAUL DP SPEARMAN (1936-1962) FRANK ROBERSON /1936.1961) RUSSELL ROWELL (1948-1977)

EDWARD F. KENEHAN (1960-1978)

CONSULTANT FOR INTERNATIONAL AND SHELDON J. KRYS

> OF COURSEL EDWARD A. CAINE' MITCHELL LAZARUS' EDWARD S. O'NEILL' JOHN JOSEPH SMITH

May 26, 1999

BY HAND DELIVERY

Magalie Salas, Esq. Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20544 Attention: Managing Director

(703) \$12-0511 FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Re:

Request for Deferral and Reduction of 1998 Regulatory Fees

for Television Stations KTNC(TV), Concord, California / KFWU(TV), Fort Bragg, California

Dear Ms. Salas:

On behalf of Pappas Concord Partners¹ ("Pappas"), licensee of KTNC(TV), Concord, California and KFWU(TV), Fort Bragg, California, this letter respectfully requests reduction of its 1998 regulatory fees for stations KTNC and/or KFWU. As demonstrated in detail below, good cause exists and the public interest would be served by this reduction. For reasons also stated below, Pappas respectfully requests deferral of any payment obligation pending consideration of its reduction showing.

Background

This request is being filed as a result of a letter from the FCC's Office of Managing Director dated March 3, 1999,² concerning FY 1998 regulatory fees for KTNC, Concord,

Pappas Telecasting of Concord, A California Limited Partnership, was the prior licensee of both KTNC and KFWU. The licenses were subsequently transferred on a pro forma basis to Pappas Concord Partners, pursuant to FCC authorization.

A copy of the letter is attached for ease of reference.

California. The FCC's letter asserts that an erroneous regulatory fee was paid for KTNC, and requests the payment of an additional \$13,000, plus a \$3,250 insufficient fee penalty, for its FY1998 regulatory fees or, in the alternative, the submission of a statement establishing that Pappas is not obligated to pay the additional amount.

On April 14, 1999, Pappas filed a statement detailing why it was not obligated to pay the additional amount. Further, Pappas demonstrated that the payment of such additional amount would be contrary to the public interest and the Commission's rules and regulations concerning the assessment and collection of regulatory fees. Subsequent to Pappas' response, Pappas was informed in a teleconference with Claudette Pride, Chief of the FCC's Fee Section, that a formal request for reduction and deferral with the Managing Director would be necessary. Accordingly, pursuant to Section 1.1166 of the FCC's rules, Pappas hereby respectfully submits the following request.³

Request for Reduction/Deferral

Section 1.1166 states that regulatory fees may be reduced in specific instances, on a case by case basis, where good cause is shown and where a reduction would promote the public interest. See 47 CFR §1.1166. As stated above, Pappas is the licensee of both UHF TV station KTNC, Concord, California, and VHF TV station KFWU, Fort Bragg, California (collectively referred to as the "Stations"). Both KTNC and KFWU are listed in the 5th ranked San Francisco-Oakland-San Jose Designated Market Area (DMA) by TV & Cable Factbook No. 66 (1998). Since April 1997, the Stations have had a parent/satellite relationship whereby the stations air the same programming. KTNC rebroadcasts, as a satellite, the programming broadcast by KFWU. KTNC makes no local origination.

While the stations are in the same DMA, such a parent/satellite arrangement is in the public interest since each station serves a different part of the San Francisco DMA. In particular, KFWU is located in the northern portion of the DMA and serves approximately 29,120 television households, whereas KTNC is located toward the center of the DMA and serves approximately 368,530 television households. See TV & Cable Factbook No. 66 (1998), A-112, A-171. The parent/satellite relationship allows the Stations to maximize programming to the DMA allowing for the provision of quality programming to both station's service areas. The Commission has long recognized the public interest benefits of the parent/satellite relationship. See Television Satellite Stations Review of Policy and Rules (Television Satellite Stations), 6 FCC Rcd 4212.

If Pappas would have known that questions would arise concerning the parent/satellite relationship, Pappas would have filed this request with its regulatory fee payment at the time such payments were due.

As stated above, the Stations operated as parent/satellite during the FY1998 regulatory fee period. Since KFWU sends the Stations' programming to KTNC for broadcast, KFWU is the parent and KTNC is the satellite. Pappas filed its regulatory fees accordingly, remitting \$1,175 in payment of KTNC's regulatory fees (Satellite TV Station Fee) and \$37,575 for KFWU (Commercial VHF Station in Markets 1-10). See In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 1998, MM Docket No. 98-36, released June 16, 1998.

Pappas is now cognizant that the KFWU/KTNC parent/satellite relationship is not listed in the 1998 Edition of Warren Publishing's Television & Cable Factbook ("1998 Factbook"). Yet, despite not being listed in the 1998 Factbook, the Stations in fact operated as parent/satellite and thus, a reduction of fees is warranted. As demonstrated below, such a reduction in this instance is consistent with the Commission's underlying policies of the assessment and collection of regulatory fees.

In the Commission's Memorandum Opinion and Order concerning the assessment and collection of regulatory fees for the fiscal year 1994, the Commission analyzed parent/satellite relationships and the assessment of regulatory fees for such combinations. The Commission recognized the public interest factors involved with such relationships and the possible inequities of assessing full service fees to both stations. See Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year, MD Docket No. 94-19, at paras. 18-22 (June 22, 1995). The Commission stated that it would analyze parent/satellite relationships based on the total of households served and assess regulatory fees on a case-by-case basis using information provided in the relevant edition of Warren Publishing's TV & Cable Factbook. Id. at 20.7

Since the Stations' signals do not overlap, no multiple ownership issues exist. Thus, there has been no need for the FCC to authorize the relationship under Note 5 of Section 73.3555 of the Commission's rules. However, this does not change the fact that KTNC operates as a satellite of KFWU.

The 1999 Edition of Television and Cable Factbook does recognize the Stations' parent/satellite relationship, however, the Factbook incorrectly refers to KFWU as the satellite.

The reason for the omission is unknown. It is possible that Warren Publishing was not informed of the relationship at the time the 1998 edition was published.

Subsequent to the June 22, 1995 Order referenced above, for the reasons stated in such decision, the Commission created a separate regulatory fee category for satellite stations.

Under the case-by-case analysis, a reduction of fees would have been clearly warranted in this instance. In particular, the <u>combined</u> number of total households served by the Stations is only approximately 400,000. See TV & Cable Factbook No. 66 (1998), A-112, A-171. An average station in the <u>51</u>st ranked DMA serves more households than the KFWU and KTNC combination. Id. at A22-A25. Yet, Pappas paid a total of \$38,750 for the Stations (KFWU – \$37,575 and KTNC -- \$1,175), while a VHF station in the 51st ranked market that serves more households was required to pay only \$22,575. Using this analysis, Pappas would have had to pay a total of no more than \$11,975 for both stations.

In further support, KFWU serves only 29,120 households, yet Pappas paid \$37,575 in regulatory fees for KFWU alone. See supra 1998 Factbook, A-171. Based on the households served, KFWU should have to pay the amount for a Remaining Markets station - \$3,100.

In light of the amount Pappas has paid for KFWU, requiring payment of full market fees for both stations under these circumstances would be contrary to the Commission's underlying regulatory fee policy and a gross injustice to Pappas, the Stations' operations and the public interest. For such reasons, Pappas respectfully asserts good cause exists and the public interest would be served by a reduction of its FY1998 regulatory fees. In particular, Pappas respectfully requests KTNC's FY1998 regulatory fee be reduced by \$13,000 to \$1,175.

In the alternative, Pappas requests a reduction of KFWU's FY1998 regulatory fees and KFWU be assessed a fee of a Remaining Markets station – \$3,100.00 and requests a refund in the amount of \$21,475 (amount paid for KFWU (\$37,575) minus amount due for KFWU as Remaining Market Station (\$3,100) minus amount owed for KTNC as full market station (\$13,000)). Since Pappas filed its regulatory fees in good faith based on how the station's actually operated during the relevant period, a waiver of any late fees is also respectfully requested.

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CONSULTANT FOR INTERNATIONAL AND INTERCOVERNMENTAL AFFAIRS SHELDON J. KRYS

> OF COUNSEL EDWARD A. CAINE* MITCHELL LAZARUS EDWARD S. O'NEILL' JOHN JOSEPH SMITH

WRITER'S DIPECT

May 26, 1999

(703) 812-0511 RECEIVED

BY HAND DELIVERY

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FEDERAL COMMANDA ON COMMISSION

Fort Bragg, California

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FLETCHER, HEALD & HILDRETH, P.L.C.

Magalie Salas, Esq. May 26, 1999 Page 5

Should there be any questions regarding this matter or if additional documentation is necessary, kindly communicate directly with the undersigned.

Yours very truly,

FLETCHER, HEALD & HILDRETH, P.L.C.

Richard Estevez

Counsel for Pappas Concord Partners

Attachment

cc: Ms. Regina Dorsey, Chief of Billing and Collections Branch (By Hand Delivery) (w/enc.)

Ms. Claudette Pride, Chief of Fee Section (By Hand Delivery) (w/enc.)

FEDERAL COMMUNICATIONS COMMISSION Washington, D. C. 20554 !UR 03 1929

OFFICE OF MANAGING DIRECTOR

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

PAPPAS TELECASTING OF CONCORD KTNC-TV 500 SOUTH CHINOWTH ROAD VISALIA, CA 93277

Dear Licensee:

This letter is in reference to the incorrect amount paid for your 1998 annual regulatory fee(s) which were due to the Federal Communications Commission (FCC) on September 18, 1998.

The FCC is currently verifying its FY '98 regulatory fee collections to identify those licensee who may have paid an incorrect amount. That process includes, but is not limited to, database verification; hard copy documentation research; review of fee-exempt certifications; and review of waivers requested and fee decisions issued; and classification as defined by the Nielsen Rating in the Broadcasting TV & Cable Factbook for 1998.

After a close examination of our records, we have determined that an incorrect payment of \$1,175 was received for the following station. The correct fee for this station should be \$14,175, a difference of \$13,000.

KTNC-TV

VISALIA, CA

In accordance with Section 9 [47 U.S.C. 159(c)(1)], a 25 percent insufficient fee penalty is assessed for the difference. Please complete the enclosed partially filled-in FCC Form 159 (Remittance Advice), and remit it together with your payment in full of the insufficient fee of \$13,000 and the associated 25 percent penalty of \$3,250 which totals \$16,250. The completed FCC Form 159 and your remittance must be mailed to the Federal Communications Commission, P.O. Box 358835, Pittsburgh, PA 15251-5835, within twenty days of the date of this letter.

You should also review your records to ensure that correct payments have been made for any auxiliary stations associated with this call sign, or for any other call signs assigned to you or for any prior fiscal years for which payments may be due, and remit payment plus 25 percent penalty for each year on a separate FCC Form 159.

If you believe you are not obligated to pay the additional fee under the Commission's Rules, or feel that the amount you submitted is the correct amount, please submit complete documentation supporting your position within twenty days of the date of this letter. These documents should be sent to:

Federal Communications Commission ATTN: Billings & Collections Branch 445 12th Street, SW Washington, DC 20554

If you have further questions, you may contact my staff at (202) 418-1995.

Sincerely,

Regina W. Dorsey, Chief Billings & Collections Branch

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500 South Chinowth Road			
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(Ia) CITY		(18) STATE	16ZIP CODE
Visalia		CA	93277
(17) DAYTIME TELEPHONE NUMBER drakes are comp (209) 733-7800		(18) COUNTRY CODE (Breatin LEAL)	
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BAJFCC CALLEGNOTHER TO GRALFAYNEST TV	SECTION C -	PAYMENT INFORMATION DUANTITY (224) FEE DUE FOR (PTC) WAS	W. W.
KFWU-TV M A		1 . \$37,575	
23A) FCC CODE 1		GW) FCC CODE 2	And the second s
8 (108) FCC CALL SIGNOTHER ID (208) PAYMENT TYP	E COOE PTC) Jan	CA, Fort Bragg	COCA 20A
K23CZ M L		1 \$265	
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WLE351 M L	B 8	1 4\$11	<u> </u>
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	SECTION	E - CERTIFICATION	
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are true and correct to the best of my		- · · · · · · · · · · · · · · · · · · ·	In Illing to
	SECTION F - CREDIT	CARD PAYMENT INFORMATION	
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MASTERCARD			
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for the normality of the PCC to strange my VIEA or is			
	E PUBLIC BURDEN EST	MATE ON DELÆBEE	FCC FORM 159 JULY 1997 (REVISED

FCC FORM 159-C JULY 1997(REVISED)

FEDERAL COMMUNI	ICATIONS	COMMI	SSION							
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12) STREET ADDRESS LINE NO. 1					•					
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FEDERAL COMMUNI	CATIONS	COMMI	SSION									
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12) STREET ADORESS LINE NO. 1					- 10, 10							
												
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118A) FCC CALL SIGN!OTHER ID	(2DA) PAYM	ENT TYPE CO	DE (PTC)	Т	(214)	YITTIMA	(22A) FEE DU	E FOR (PTC) IN	BLOCK 20A	****		
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FCC FORM 159-C JULY 1997(REVISED)

Payment Transactions Detail Report

BY: FEE CONTROL NUMBER

Fee Control Payor Fcc Account Payer
Number Name Number TÍN

PAPPAS TELECASTING OF CONCORD FCC201

FCC2017412 9/11/1998 00:00:0

Received Date Date: 07/19/1999

500 SOUTH CHINOWTH ROAD

VISALIA

9809158835519002

CA

93277

Payment	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check		Trans Code	Payment Type
\$39,081.00	\$39,081.00	2	MLP8	1	K23CZ	PAPPAS CONCORD PARTNERS	93277	* •	\$265.00	1 .	PMT
\$39,081.00	\$39,081.00	1	MAV8	1	KFWUTV	PAPPAS CONCORD PARTNERS	93277		\$37,575.00	1	PMT
\$39,081.00	\$39,081.00	5	MSS8	1	KTNCTV	PAPPAS CONCORD PARTNERS	93277		\$1,175.00	1	PMT
\$39,081.00	\$39,081.00	7	MUB8	1	WHG446	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	6	MUB8	1	WHG447	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	4	MUB8	1	WLE335	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	3	MUB8	1	WLE351	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	8	MUB8	1	WMU401	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	. 9	MUB8	1	WNTU838	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
9			•						\$39,081.00	•	

FCC FORM 159-C JULY 1997(REVISED)

FEDERAL COMMUNIC	<u> </u>	COMM	331014						
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12) STREET ADDRESS LAE NO. 1			ø	-					
13) STREET ADDRESS LIKE NO. 2									
ia) CITY		··			(H) STATE			K16) 2P COO	£ .
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				ION CC	-PAYMENT INFO				
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(36) FCC CALL SIGNOTHER ID	(208) PAYM	ENT TYPE CO	CE (PTC)		218) OUNTITY	(236) FEE DUE FOR (PTC) M	6LOCK 206		
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238) FCC CCOE 1					(248) FCC CODE 2			•	
ISC) FCC CALL SIGNOTHER ID	T/200) PAYM	ENT TYPE CO	CE (PTC)		(21C) QUANTITY	(22C) FEE OUE FOR (PTC) H	I BLOCK 20C		علوك يعرضهم أحاسيهم
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ZIC) FCC CODE 1	لـــــــــــــــــــــــــــــــــــــ				(2+C) FCC COOE 2	<u> </u>			المراقع المراق المراقع المراقع المراق
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mo; FCC COCE 1					(240) FCC CODE 2				
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25) COMPLETE THIS BLOCK CALLY IF S		_	TINI				777	T	
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Payment Transactions Detail Report

BY: FEE CONTROL NUMBER

Fee Control Number Payor Name Payer TIN Received Fcc Account Number Date 9809158835519002 **PAPPAS TELECASTING OF CONCORD** FCC2017412

500 SOUTH CHINOWTH ROAD

9/11/1998 00:00:0

Date: 11/09/1999

VISALIA

CA 93277

Payment	Current Balance	Seq Num	Payment Type		Callsign Other	Applicant Name	Applicant Zip	Bad Check		Trans Code	Payment
_Amount			Code	Quantity	<u>Id</u>	Namo					Туре
\$39,081.00	\$39,081.00	2	MLP8	1	K23CZ	PAPPAS CONCORD PARTNERS	93277		\$265.00	1	PMT
\$39,081.00	\$39,081.00	1	MAV8	1	KFWUTV	PAPPAS CONCORD PARTNERS	93277		\$37,575.00	1	PMT
\$39,081.00	\$39,081.00	5	MSS8	1	KTNCTV	PAPPAS CONCORD PARTNERS	93277		\$1,175.00	1	PMT
\$39,081.00	\$39,081.00	7	MUB8	1	WHG446	PAPPAS CONCORD PARTNERS	93277		\$11: 0 0	1	PMT
\$39,081.00	\$39,081.00	6	MUB8	1	WHG447	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	4	MUB8	1	WLE335	PAPPAS CONCORD PARTNERS	93277	•	\$11.00	1	PMT
\$39,081.00	\$39,081.00	3	MUB8	1	WLE351	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	8	MUB8	1	WMU401	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
\$39,081.00	\$39,081.00	9	MUB8	1	WNTU838	PAPPAS CONCORD PARTNERS	93277		\$11.00	1	PMT
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